Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matters of	)	
	)	
Provision of Directory Listing Information Under the Communications Act of 1934, As Amended	)	CC Docket No. 99-273
	)	
The Use of N11 Codes and Other Abbreviated Dialing Arrangements	)	CC Docket No. 92-105
	)	
Administration of the North American Numbering Plan	)	CC Docket No. 92-237

REPLY COMMENTS OF QWEST CORPORATION AND QWEST WIRELESS, LLC

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I. INTRODUCTION AND SUMMARY

A. Background

Qwest Corporation and Qwest Wireless, LLC ("Qwest") respectfully submit these Reply Comments in this *Notice of Proposed Rulemaking* released by the Federal Communications Commission ("Commission" or "FCC").[1] The Commission seeks comment on proposed methods of promoting competition in the retail directory assistance (or "DA") market, including a proposal by Telegate, Inc. ("Telegate") urging the adoption of 411 presubscription for local voice *wireline* directory assistance offerings. The *Notice* also seeks comment on whether other regulatory approaches (including modifying the 411 dialing pattern along the lines of 411XY,

[1] *In the Matter of Provision of Directory Listing Information Under the Communications Act of 1934, As Amended, The Use of N11 Codes and Other Abbreviated Dialing Arrangements, Administration of the North American Numbering Plan*, CC Docket Nos. 99-273, 92-105 and 92-237, *Notice of Proposed Rulemaking*, FCC 01-384, rel. Jan. 9, 2002 ("*Notice*"), *Order*, DA 02-263, rel. Feb. 5, 2002 (extending comment date after publication in the Federal Register), 67 Fed. Reg. 6902 (Feb. 14, 2002).

eliminating the 411 dialing pattern, promoting 555-xxxx dialing patterns, etc.) are necessary to promote competition of directory assistance services.

In its opening Comments, Qwest attached a report by the National Economic Research Associates ("NERA")[2] that described in detail the composition of the directory services market and analyzed various proposals to modify currently-used numbering access codes to reach local directory assistance. That Report demonstrated that a wide variety of directory services are available to consumers (either directly or through their carriers) and foreclosed any credible argument that barriers to entry existed with respect to the provision of such services. Qwest showed that the robust nature of current competition, combined with the sharp declines in local directory assistance call volumes experienced by local exchange carriers ("LEC"), precludes the need for any regulatory action, much less imposition of additional costs to ameliorate a non-existent "problem.

B. Filed Comments To Which Qwest Herein Replies

Like Qwest, the vast majority of commenting parties oppose the Telegate proposals for 411 presubscription; or the modification of 411 calling through some kind of 411 reconfiguration (*e.g.*, 411XY).[3] In this respect, the current filings confirm positions advanced during the prior public comment period.[4] Opponents of changes to the *status quo* 411 dialing pattern include

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[2] Competition and Regulation for Directory Assistance Services, prepared by William E. Taylor and Harold Ware, National Economic Research Associates, Inc. ("NERA Report"), attached to Qwest's Comments fileD Apr. 1, 2002. The NERA Report was also attached to BellSouth's comments at Exhibit B, SBC's comments at Attachment 1 and also to Verizon's comments.

[3] *See Notice* ¶ 53. Telegate at 18-23. The matter of 411XY is also a proposal of Metro One. Metro One at 6, 18-21.

[4] *Common Carrier Bureau Seeks Further Comment on Telegate's Proposal for Presubscription to "411" Directory Assistance Services*, *Public Notice*, 15 FCC Rcd. 7563 (2000) ("*Telegate Public Notice*"). *See* AT&T Corp. ("AT&T") at 2 (when comment was first sought on the

LECs and Bell Operating Companies (such as BellSouth, CBT, SBC, Sprint, National Telecommunications Cooperative Association ("NTCA"), National Exchange Carrier Association, Inc. ("NECA"), Qwest, and Verizon), competitive local exchange carriers ("CLEC") (such as AT&T), interexchange carriers ("IXC") (such as AT&T and Sprint), as well as labor and consumer representatives (such as the Communications Workers of America ("CWA")).[5] Moreover, no material public or consumer comments have been filed in support of changes to 411 dialing.[6] Add to this the fact that Telegate is exiting the United States,[7] and there

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Telegate proposal in "April 2000 . . . with the exception of Telegate, [the Commission] received an overwhelmingly negative response").

[5] The Telecommunications Research and Action Center ("TRAC") takes no specific position on the Telegate proposal in its opening comments but expresses concern "that the solution [to high directory assistance prices] lies not in inserting artificial 'competition' that eliminates efficiencies of scope and scale, drives up prices and adds to customer confusion." TRAC at 1-2.

[6] BellSouth at 3; CWA at 1 ("[i]n the year and one-half that the Commission has been considering Telegate's various proposals, no consumer groups have submitted comments in support of any of the proposals"); Sprint at 4-5 (referencing an earlier filing by Mr. Richard Sayers presenting evidence of his own survey on the matter that reflected overwhelmingly rejection of the proposals), 10; SBC at 4, 25; Verizon at 14.

On April 29, 2002, two self-declared "consumer groups" filed brief comments with the Commission expressing support for the ideas proffered by Telegate. *See* Letter from Consumers Union, to Michael K. Powell, Chairman, Federal Communications Commission, dated Apr. 29, 2002 and late-filed comments (with no explanation or request for waiver) by the Consumer Federation of America ("CFA"), dated Apr. 29, 2002. The Consumers Union letter (two pages) makes the already-rebutted assertion that "alternative DA services have not succeeded in bringing robust competition to the market." The four-page CFA document claims "Directory assistance is an area that has not received adequate attention to market opening" (CFA at 1), ignoring past Commission commentary on the competitive nature of directory assistance services and the existing record evidence in this proceeding. CFA asserts that consumers are wedded to 411 dialing and will not change. CFA at 2. This, of course, is proven wrong by the existing record evidence on shifts in directory assistance calling. *See* notes 33-36 and accompanying text, *infra*. CFA also attacks -- citing to newspaper articles -- the quality of ILECs directory assistance offerings. CFA at 1. Of course, some ILECs have already commented on this matter. *See* note 26, *infra.* At this point in the proceeding, CFA should be providing more meaningful evidence, rebutting current record evidence of the quality of carrier directory assistance services, if it actually expected its comments to be persuasive. Finally, neither Consumers Union nor CFA attempts to quantity its asserted benefits or justify those benefits in light of already filed seems no reason to continue this proceeding and the concomitant consumption of industry and regulatory resources.

The broad-based consensus of retaining 411 dialing as it currently exists with no change confirms that proffered proposals by Telegate and its supporters are not in the public interest. Commentors arguing for a retention of the *status quo* focus on four main themes. **First**, commentors point out that those service providers pressing the hardest for changes in the 411 dialing pattern are information service providers, with service offerings not necessarily aligned with carriers. The commentors argue, correctly, that persons who need traditional, basic directory assistance should be able to continue to access such services through the easy-to-use, well-recognized dialing pattern. **Second**, commentors point to the fact that the evidence is indisputable that directory assistance choices abound for consumers and entry into the business is not adversely impacted by any barriers -- numbering or otherwise.

Third, all commentors that would be subject to network and infrastructure modifications (and indeed some that would not) point out that the costs of changing the current 411 dialing pattern and network architecture would be huge. For 411 presubscription, the cheapest deployment would require nationwide deployment and modifications to the Advanced Intelligent Network ("AIN") infrastructure and signaling networks of carriers, as well as modifications to Operational Support Systems ("OSS") and potential balloting and allocation costs. Other proposals fare no better in terms of their cost burden. Supporters of Telegate's proposals do not

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record cost information. Overall, these comments provide little in the way of meaningful record evidence on the important matters in this proceeding.

[7] Both CWA and AT&T remark on this situation which was reported in Telegate's 2001 Annual Report (CWA at 5 and n.15) as well as in the press (AT&T at 4 and n.5). According to Telegate's Annual Report, "The Power of Voice" at p. 22, "telegate, Inc., USA, . . . [was] reclassified as Discontinued Operations, since these subsidiaries are no longer part of telegate's strategic focus."

accurately estimate the cost burden of their proposals, or rebut evidence about their miscalculations, and they provide no sound analysis for a cost recovery program. The Enhanced Directory Assistance (or "EDA") providers seek to recover costs of their radical network and numbering proposals on every person in the United States, or on those making directory assistance calls, rather than on the EDA providers themselves, despite the fact that the EDA providers are clearly the "cost causer" associated with their proposals. **Fourth**, the customer confusion that would be associated with all of the proposals to change out the current directory assistance framework is plainly unwarranted. While some EDA providers dismiss the scope of this customer impact, it is likely to be significant and persistent.

In contrast to those urging the continuance of the 411 dialing pattern and the avoidance of unwarranted network changes and attendant costs, proponents of Telegate's proposal and other directory assistance delivery alternatives (*e.g.*, 411 with voice recognition (Metro One), deployment of 555-dialing patterns (InfoNXX, Metro One, Premiere Network Services, Inc.), modification of carrier identification codes ("CIC")/carrier access codes ("CAC")) provide no persuasive evidence to rebut that evidence already on the record as a result of the *Telegate Public Notice*, evidence buttressed in this round of the proceeding by the NERA Report. These proponents fail to counter record evidence demonstrating (a) the robust nature of directory assistance competition, (b) the absence of barriers to entry, (c) the mammoth cost burden their proposals entail, (d) the inadequacy of their cost recovery proposals and (e) the customer confusion and discombobulation attendant to their proposals.[8]

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[8] *See* AT&T at 3, 11, 14; CBT at 10, 15; SBC at 51. *And see* InfoNXX at 17-18 (asserting that 411 presubscription would likely cause significant customer confusion, but claiming that 555-xxxx deployments would not), 21 (arguing that even if there were customer confusion associated with 555-xxxx deployments, such confusion was outweighed by competitive benefits).

Accordingly, the Commission should reject the proposals, and it should do so now. The public interest would be burdened rather than served by any other course.

II. ENHANCED DIRECTORY ASSISTANCE PROVIDERS FAIL TO ADDUCE CREDIBLE EVIDENCE THAT A CHANGE IN THE CURRENT DIRECTORY ASSISTANCE FRAMEWORK IS REQUIRED BY LAW OR IN THE PUBLIC INTEREST

A. EDA Providers Seeking Modification To 411 Directory Assistance Sell Information Services

In the main, supporters of 411 dialing modifications are confined to EDA.[9] Telegate, Metro One and InfoNXX, are in the business of selling information well beyond directory assistance.[10] EDA providers tout their services which include "movie show times, driving directions, 'yellow page' searches, restaurant reservations, traffic, weather, stock price reports and sports scores."[11]

It is true that these service providers take on a carrier mantle when providing "telecommunications services" directly (such as through call completion) or when acting as an

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[9] WorldCom is the outlier with respect to this observation.

[10] *See* 47 C.F.R. § 51.319(f) ("Directory assistance is a service that allows subscribers to retrieve telephone numbers of other subscribers").

[11] InfoNXX at 4 (noting that these are included in the assistance services that it provides to wireless customers pursuant to contracts with wireless carriers). *And see* SBC at 24 (InfoNXX offers "enhanced services such as movie listings and show times, category searches (e.g., doctors, florists), sports scores and weather conditions"); Verizon at 12 (describing InfoNXX services as including "movie listings and show times, category searches, special event information, sports scores, reverse searches and weather conditions"), 27-28. *And see* Metro One at 2 (services include "movie listings, information on local events, reservations (such as concerts and sporting events), geographic directions, weather warnings, private directory access and school closings."). The description of these services belies InfoNXX's assertion that this is "an independent telecommunications market". InfoNXX at 2, n.1. It is no such thing. It is an information services market whereby <u>through a telephone</u> an individual secures useful information about the world -- sometimes in order to complete a telephone call.

agent for carriers.[12] Still, theirs is a business plan of working from information services delivery into telecommunications services, rather than the reverse (as has been the history of telecommunications carriers). As their comments make clear, EDA providers do not seek the 411 dialing pattern to provide basic information on how to complete phone calls. They want to burden the entire telecommunications industry -- its switching and routing infrastructure -- to provide concierge information services.[13] While the objectives of providing this kind of information to the public cannot be impugned, for LECs the decision to provide such services is fraught with complications.

What proponents of modifications to the 411 dialing environment ignore are the enormous costs of proceeding with such action.[14] Accordingly, they refuse to engage in even a primitive cost-benefit analysis. To the extent LECs are generally willing to abide by the earlier "regulatory contract" (*e.g.*, 411 need not be opened to others unless LECs choose to offer information services),[15] the Commission should not require changes in the 411 access code for

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[12] *Provision of Directory Listing Information under the Telecommunications Act of 1934, As Amended*, *First Report and Order*, 16 FCC Rcd. 2736, 2745-46 ¶ 20 (2001) ("*SLI/DA First Report Order"*). *And see* Metro One's description of its services making clear that it is both a telecomm-based directory assistance provider and an EDA provider. Metro One at 1.

[13] Metro One at 23 (customers could contact the "best concierge services or array of sports or news information").

[14] The Commission has stated that LECs offering information services through 411 risk having to extend that dialing pattern -- with all the costs that entails -- to others. *See In the Matter of The Use of N11 Codes and Other Abbreviated Dialing Arrangements*, *First Report and Order and Further Notice of Proposed Rulemaking*, 12 FCC Rcd. 5572, 5600-01 ¶ 48 (1997). *And see* CBT at 6; Metro One at 18, n.41.

[15] This argument is not meant to suggest that at some time it might not be in the public interest to allow LECs to provide a broader range of directory assistance offerings than they do today through the 411 access code without incurring the cost of opening the code. Such a decision could be coupled with a request for waiver of the current mandate that 411 be shared with others, in the event that LECs provide information services *via* the code. Or a Further Notice of Rulemaking or forbearance might be sought. But the context described herein is different from

local voice wireline directory assistance. A LEC's decision to confine its service offering (with the possible restriction of revenue) in order to avoid massive expenditures is not irrational and reflects the regulatory environment that divides the world into categories, some of which involve substantial carrier burdens and some of which do not.

The record shows that consumers have easy access to broad information when they want it, and they have access to basic 411 directory assistance when the latter better meets their needs.[16] A determination to change the dialing pattern or extend it to EDAs will certainly embroil the Commission in serious jurisdictional issues, as well as substantive issues concerning the content and delivery of the services.[17] This unnecessary entanglement can be avoided by rejecting the proposals from the EDA providers and allowing the *status quo* to continue. As discussed below, the public interest will be advanced rather than harmed by such an approach.

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that proposed by Telegate. A decision on such a LEC request must await the presentation of facts and evidence on that request with its own cost/benefit analysis.

[16] WorldCom asserts that 411 presubscription is necessary to increase a "wide range of innovative services . . . more innovative products than just number listings." WorldCom at 6. *And see* Telegate at 2-3 (LECs "have failed to expand their DA offerings beyond the most basic number-retrieval services"). However, the record is clear that such products are currently widely available to individuals and that consumers do not lack reasonable choices with respect to such services. *See* Section II.B., below. As AT&T states, "the provision of enhanced DA services is not mutually exclusive with the continued provision of basic DA services. Basic DA services can be provided via 411, while enhanced DA services can be provided by alternative means." AT&T at 11-12.

[17] *See* BellSouth at 2, 5-9; CBT at 3; CWA at 7; SBC at 2-3, 5-20; Verizon at 27-28 (arguing that such services should be regulated as pay-per-call services). *And see* InfoNXX at 6 and n.7 (addressing numbers that "have not traditionally been used for pay-per-call services such as directory assistance," noting the same pay-per-call provisions cited by Verizon) (emphasis added). *See also* AT&T at 7. *Compare* Telegate at 4-5 and nn.8-9 (noting that the access numbers historically used in Europe for directory assistance are "pay-per-call numbers similar to 900 numbers" and that the European response was to move all directory assistance providers to these numbers, rather than extend the basic directory assistance number to all providers). *But see* Metro One at 27 (focusing on the provision of directory assistance by a carrier and ignoring the offering of such service directly by an EDA provider).

B. Individuals Have Many Choices Regarding Directory Assistance Services

The NERA Report[18] filed by Qwest and others, like the Frost & Sullivan report before it,[19] makes a solid case that directory assistance services proliferate in the United States, that there are no barriers to entry and that consumers are well served by the existing service environment. In addition to these types of evidentiary submissions, comments from other parties demonstrate the robust competition attendant to directory assistance offerings.[20] The weight of the evidence bears witness to the fact that the directory assistance marketplace is hardly "stagnating" (as Telegate claims)[21] but is vitally competitive.

C. Declining LEC Volumes Coincide With Increased Competition

Competitive alternatives (not only EDAs, but directory assistance offerings of IXCs,[22] CLECs[23] and wireless carriers)[24] have largely been responsible for the declining volumes of calls

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[18] *See* note 2, *supra*.

[19] *Notice* ¶¶ 19-20 (describing Qwest's Frost & Sullivan submission in its May 24, 2001 *ex parte*. That submission covered the years 1996-2006). Metro One filed a "new" Frost & Sullivan Report regarding the years 2001-2007.

[20] *See* AT&T at 11; BellSouth at 9-11, 16-20; CBT at 2-3; CWA at 3-4 (citing to data gleaned from the websites of Metro One (noting an increase volume of 56% between the years 2000 and 2001)), at 5 and n.13 (noting volume increases of 100% over the prior year reporting and a Dun & Bradstreet report on Excell); The Independent Telephone and Telecommunications Alliance ("ITTA") at 3-4 and nn.5, 8, 9 (providing website addresses for directory assistance offerings); NTCA at 2 (providing website addresses for free directory assistance offerings); SBC at 3-4; Sprint at 2; Verizon at 8-13.

[21] Telegate at 3.

[22] Telegate's, InfoNXX's and Metro One's arguments that entities have made "unsuccessful efforts to provide alternative DA services using 10-10-XXX" (Telegate at 3), that 800 numbers and other dialing patterns cannot compete with 411 dialing patterns (InfoNXX at 6, 11) and that "dial-around patterns" are inferior dialing mechanisms through which to provide directory assistance are resoundingly rebutted by the providers of those services. *See* AT&T at 10 (referencing its "00" offerings), 12; SBC at 3, 21; Sprint at 2, 4 (IXCs "have captured 36% of the DA market through 1-NPA-555-1212").

[23] CBT at 2-3; SBC at 3, 21; Sprint at 2; Verizon at 8-13.

to LEC's voice wireline directory assistance offerings.[25] As commentors point out, that part of the directory assistance market that involves local wireline voice directory assistance services has suffered severe decline since 1996 -- decreases of 50%,[26] at the same time that the overall directory market has grown more competitive. These declines in LEC local wireline voice directory assistance offerings are all the more pronounced in light of the fact that 5% of the population make 80% of the calls,[27] and those 5% make fewer than three calls per month.[28] Were proposals to change the 411 dialing pattern adopted, and were cost recovery sought from the users of local wireline voice directory assistance, a small fraction of the LEC customer base

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[24] BellSouth at 10, 14-16; CBT at 2; InfoNXX at 4-5 and nn.5-6; Metro One at 4-5, 10-11, 14-16; SBC at 3, 21, 23-24; Sprint at 2, 4.

[25] BellSouth at 2; CBT at 4; SBC at 21-22. *Compare* Sprint at 4.

[26] CBT at 4-5 (43% reductions since 1994); BellSouth at 2 (49% reduction from 1996 to 2001), 12; Verizon at 11 and n.32, 13 and n.39; SBC at 22 ("At least 10% per year since 1997"). *Compare* CWA at 4 (and noting the reduction in human operators attendant to the reduction). *And see* Qwest Comments at 4-5 and n.12 (referencing BOC June 6 *Ex Parte* at 1; BOC October 31 *Ex Parte* at 1). Moreover, it is clear that the reductions in call volumes are not due to lack of quality services. *See* CBT at 4-5. *And see* BOC June 6 *Ex Parte* at 1, 4; BOC October 31 *Ex Parte* at 4.

[27] *See* NERA Report at 4. This statistic was cited by CWA at 2. *See also* BellSouth at 26 (data indicates that 20% of residential customers in the United States generate 80% of calls); Verizon at 14 ("8.5 percent of the customers accounted for 60 percent of the Verizon DA calls."). *And see* Qwest Comments at 4-5 and n.12 (referencing BOC June 6 *Ex Parte* at 1; BOC October 31 *Ex Parte* at 2). Note also that the decline is a trending decline. For example, while Qwest enjoyed a significant spike in call volumes immediately after it began offering national directory assistance, call volumes have since continued their downward trend. *Id.* This calls into question the InfoNXX assertion that national directory assistance offerings are increasingly handled by LECs. InfoNXX at 7 and n.9.

[28] *See* BellSouth at 26 (only 20% of callers make more than one call per month); ITTA at 5-6 (its members report that callers make less than one call per month); SBC at 25. See *also* InfoNXX at 16 ("many consumers do not now use DA services extensively"). *Compare* CWA at 2 ("80 percent of consumers make three or fewer DA calls per month").

would be burdened with the recovery of millions of dollars of network and infrastructure modification costs. Cost recovery would be impossible.[29]

The combined evidence regarding existing competition and the persistent loss in calling volume realized by the LECs does not, as Telegate argues, represent a "lock[ ] out" of competitive entry.[30] Quite the contrary. It reflects an ease of entry unparalleled in the communications environment. Moreover, Telegate's assertion that the LECs' provision of national directory assistance requires that the Commission "rectify [the] situation"[31] because LECs are cutting into the volumes enjoyed by other competitors is based on rhetoric, not fact.[32]

Finally, the calling volume evidence (including facts pertaining to shifting calling volumes) belies the accuracy of InfoNXX's assertion that callers to directory assistance "have become habituated, and thus involve little or no consideration of alternative purchasing options."[33] As LEC call volumes have decreased, call volumes of others have increased. Wireless directory assistance has grown at a rate of 13.3%[34] and Internet directories/directory

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[29] Telegate and its supporters suggests alternatives to spread the costs of its proposals across a larger base of customers, including those who make no directory assistance calls at all. Telegate at 20, n.42, 21, n.49. This cost recovery methodology is certainly questionable with respect to the principle that costs should be recovered from the cost causers.

[30] Telegate at 2. *And see* InfoNXX at 2, 5 (making similar allegations).

[31] Telegate at 3. *And see* InfoNXX at Summary ("remedy this situation").

[32] *Compare* CWA at 4 (asserting that its steepest labor cuts associated with the Bell Companies "took place after AT&T pulled its contract with the Bell companies and began to offer its own AT&T-branded 00-Info DA service.").

[33] InfoNXX at 11.

[34] *See* Sprint at 4. *And see* Metro One at 10 ("wireless DA volume of call growth rate has exceeded wireline volume growth rate by 11-14% from 1999-2001 and this double digit growth rate disparity is anticipated to continue through 2007"); SBC at 21 ("wireless DA call volumes have increased significantly between 1997 and 2000 – 10.5% in 1998, 11.6% in 1999 and 12.6% in 2000, and are forecasted to continue to grow," referencing NERA Report at 17).

assistance has grown at a 32.9% rate.[35] Independent directory assistance providers have captured over 50% of the wholesale market.[36] The data demonstrate that consumers know they have choices regarding directory assistance providers and are exercising those choices.

D. Proponents Of Changes To The 411 Dialing Environment Ignore Meaningful Cost/Benefit Analyses

In response to the *Telegate Public Notice*, industry members filed cost information regarding the Telegate proposal for the Commission's consideration. That information demonstrated that, in some cases, a single carrier's costs were close to or exceeded Telegate's proposed "entire industry" cost.[37] Incredibly, Telegate (and those proffering alternative proposals) made no effort in response to the current *Notice* to refute the existing record evidence.[38]

Nor have Telegate or others formulated cost recovery mechanisms appropriate to their proposed changes to 411 directory services delivery. As Qwest and others have argued, such costs should be recovered from the EDA providers, not from end users making directory assistance calls.[39] It would violate sound cost recovery principles to burden all customers of all common carriers with the costs of proposed alternatives to the current 411 directory assistance

[35] *See* Sprint at 4. *And see* SBC at 23.

[36] *See* SBC at 24.

[37] Comments of Qwest [U S WEST Communications, Inc.], CC Docket Nos. 99-273 and 98-67, filed May 30, 2000 at 15-19 in response to *Telegate Public Notice*. *And see* Verizon at 19-23.

[38] Telegate's cost arguments have lost all credibility as it continues to argue that its proposals involve "relatively minor one-time costs." Telegate at 3. While such a statement may have been (marginally) excusable in 1999 when it first presented its proposals, the existing record is replete with evidence (post the earlier *Telegate Public Notice*) demonstrating that the costs involved in implementing either a 411 presubscription or a change in dialing pattern to a 411XY model would be material, substantial and ongoing. Were an unnecessary "administrator" somehow to become involved in the deployment (*see* Neustar, *passim*), there would be additional industry costs. *See* Verizon at 23-24.

[39] NERA Report, Section II.C at 10 and Section V. at 57.

landscape.[40] And, particularly in the LEC market, any cost recovery mechanism would fail if it were confined to the limited number of individuals using 411 directory assistance. As AT&T concludes, "The minimal benefits (if any) to consumers of 411 presubscription and many of the alternatives proposed in the [*Notice*] . . . are substantially outweighed by the significant costs that would be imposed on carriers and, ultimately, consumers through such approaches."[41] The inability of those seeking to change the existing 411 dialing pattern to present reasonably likely cost figures or to identify a workable cost recovery plan, proves fatal to their arguments.

1. <u>411 Presubscription Costs</u>

In this comment cycle, previously-submitted cost information is repeated and revised cost information is provided. The picture fares no better than it did going into this proceeding. Evidence by the entities who would be responsible for implementing Telegate's proposals shows that Telegate has materially understated the costs of its proposals.[42] And, Telegate never responds to the existing evidence showing these costs exceed its predicted deployment cost of $23M for the whole industry.

As ITTA accurately puts it, Telegate's "numbers are highly suspicious."[43] Telegate's original cost estimates failed to include <u>predictable</u> deployment costs including upgrading local switches to AIN capability, reconfiguring current AIN capabilities to accomplish the 411

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[40] *See* note 29, *supra.* This is not a "social program" or a regulatory program imbued with nationwide significance so as to warrant the kind of "all customer" recovery programs associated with Telephone Relay Service ("TRS") recovery or number portability surcharges.

[41] AT&T at 1.

[42] CWA at 1; NTCA at 3.

[43] ITTA at 6-7 (noting that the "source" of the information is an advocacy piece, representing neither quantitative completeness nor objectivity).

presubscription (including costs associated with database development and query transport services),[44] and Telegate-proposed balloting and allocation costs.[45]

In this round of comments, Sprint, Verizon and others provide newly revised cost information. Sprint's revised estimate is that it would cost Sprint $88M (or $11 per subscriber) to deploy the Telegate proposals, rather than its earlier too-low estimate of $50M.[46] Verizon's current estimate is that it would cost more than $190M to accomplish presubscription through an AIN deployment, without even factoring in required costs for OSS changes.[47] SBC now postulates that an AIN-based presubscription would cost it $45M with another $4M for other necessary complementary deployments.[48] CBT disagrees with Telegate's figures of $0.11 per subscriber, asserting that its estimates show a cost burden of $3.5 to $4M converting to $3.76 per

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[44] *See* AT&T at 4-6 (noting the problems of reconfiguring AIN 0.1 to accomplish 411 presubscription); BellSouth at 23-24 (there would be a need to activate AIN trigger); CBT at 6-7 (it would have to upgrade one third of its switches and those that were AIN functional would require modifications, including trigger activations); NECA at 2-3 (noting that Telegate had projected a national directory assistance presubscription cost of less than $23M, failing to include any amounts for the most basic prerequisite of its proposal -- upgrading local switches to AIN capability, an upgrade that would be necessary for many carriers and in large portions of the country). *Accord* AT&T at 5; BellSouth at 23-26; CBT at 6-7, 8-9 ($3.5 to $4M); ITTA at 8-9; Sprint at 5-7 and n.12; Verizon at 19-20. *And see* SBC at 26-27 (describing its costs burden in somewhat different terms).

Telegate did not attempt to "cost out" its line class code suggestion for accommodating 411 presubscription because it preferred to proceed with the less costly AIN proposal. It is worth noting, however, that both Nortel and Lucent have advised that their present switching system software would not support such activity, requiring developmental and installation costs were this proposed deployment approach to be seriously considered. *Notice* ¶ 28. *See also* NECA at 2 and n.5.

[45] The Telegate proposal goes beyond that even adopted for IXC presubscription, by requiring carriers to provide "a self-addressed envelope." *See* ITTA at 7-8 and n.23 (arguing that it would cost in the area of $345M for the industry to engage in balloting, even if one extrapolated from the most-likely inaccurate Telegate assumption of $1.13 per line).

[46] Sprint at 2, 6.

[47] Verizon at 19-22.

[48] SBC at 4, 27-32 (and noting that a switched-based modification would run $600M).

subscriber.[49] And ITTA states that for one of its member companies, the "first-year costs alone [would] be in excess of $33.26 per access line"[50] to bring out 411 presubscription. Not Telegate or any of its supporters, nor those proposing alternatives to Telegate's proposals, begin to justify expenditures of this kind. Opponents demonstrate they cannot be justified.

2. Costs of 411 "Alternatives"

Costs associated with other "alternatives" to 411 presubscription are not so materially lower that they warrant pursuing them. Using LIDB as a means of accomplishing 411 competition has not been proven by its primary proponent, Illuminet,[51] to be reasonably achievable and is roundly criticized as being unsuitable for the task.[52] Nor are the costs associated with other alternatives (*e.g.*, converting the 411 dialing pattern to a 411XY,[53] adoption

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[49] CBT at 8-9.

[50] ITTA at 9 (underline in original).

[51] Illuminet continues to support a LIDB model (Illuminet, *passim*), never rebutting the arguments made against this approach in 2000 and currently. For example, it argues in a truly understated voice that "[w]ith minor modifications including the addition of a new data element to the existing LIDB protocol and possible capacity upgrades for query capacity and/or data storage capacity" that LIDB would be an appropriate alternative to 411 presubscription. *Id.* at 2. Its position is roundly disputed by commentors. *See* note 52, *below*.

[52] *See* AT&T at 2 (noting that attempting to use LIDB to accomplish 411 subscription "would be even more technically and economically infeasible than the AIN solution. Access to LIDB is not widely deployed in carrier networks and, even if it were, there is no evidence that it can be used to route calls or otherwise perform the functions necessary for DA service"), 6, 8-9 (noting that in some carriers' networks, local switches do not have the ability to launch a LIDB query and that calls requesting such a query are routed to an operator services platform); BellSouth at 24-26 (addressing LIDB modifications and deployments associated with EDA providers' proposals); CBT at 7-8 (not suitable to the task and more expensive than AIN); SBC at 36-37; Sprint at 7-8 (asserting that the costs of this type of deployment would be in the vicinity of $77.5M); Verizon at 22-23.

[53] AT&T at 3 ("the use of 411XY numbers would require the telecommunications industry to reconfigure the entire public switched network . . . to recognize new dialing patterns, potentially costing billions of dollars"), 14-15; SBC at 4 (would cost "hundreds of millions" to implement), 43-45.

of a CIC/CAC,[54] deployment of 555-xxxx dialing)[55] demonstrated to be in the range where the benefits can be proven to outweigh the costs.

E. Proponents Of Changes To The Current 411 Dialing Pattern Ignore Realistic Deployment Dates

Like the failure to adjust cost estimates to reflect record evidence, Telegate takes a similar approach with deployment timelines. As if there had been no comment on its under-estimated timelines, it continues to argue that "[i]t should take no more than a year to implement fully either 411 presubscription or 411XY".[56] The comments of others have a similar theme. They are replete with references to what it "would only" take to implement the Telegate or alternative proposals.[57] Reading these filings, one would think these entities had never been parties to implementation activities, such as standards establishment, or network deployments.

Telegate fails to support its asserted timeline with any evidence of a domestic federal regulatory initiative comparable to its proposal -- such as IXC presubscription or other N11 numbering deployments -- that was accomplished in such a short time frame. As BellSouth notes, deploying the AIN trigger in those offices that already are AIN–capable would itself take a year.[58] And, as other commentors that have participated in implementing network changes in the

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[54] *See, e.g.,* SBC at 4 ("several million").

[55] *See, e.g., id.* at 4 ($14M if AIN-based and $431M if switch-based), 46 ($12M to $31M if AIN-based and $431M to $447M if switch-based).

[56] Telegate at 27. *See* Metro One at 22 (agrees that tasks could be accomplished in six-to-nine months).

[57] *See, e.g.,* Illuminet at 2 ("minor modifications" to LIDB would be necessary; industry standards committees "would only have to identify a new LIDB protocol data element"); Metro One at 19 (to implement various dialing plans "only requires that [LECs] and the wireless carriers" take certain actions).

[58] *See* BellSouth at 3-4 (and noting that a LIDB solution could not be deployed any faster).

past attest, accomplishing the Telegate proposal (or any of the proposed alternatives) could easily take over a year to accomplish, with supporting or complementary tasks taking even longer.[59]

Moreover, the Telegate deployment estimates treat carriers (LECs, in particular) as if they were a monolithic "industry" with a single network architecture or supplier, rather than a diverse set of companies with networks at all times in various stages of churn, change and modification. This alone proves fatal to a realistic projection of implementation timeframes.

Instead of meaningfully analyzing the impact of its proposal on domestic carriers, Telegate simply argues that "Germany's implementation"[60] took less than a year. Yet Germany, in Telegate's own analysis, had but a single state-sanctioned incumbent (Deutsche Telekom),[61] rather than hundreds of incumbent carriers. Moreover, Telegate never states the range of supplier equipment utilized by that incumbent. In light of the single state-sponsored carrier providing service in Germany, Qwest suggests that its suppliers numbered fewer than those enjoyed by the numerous LECs in the United States.

F. The European Experience Does Not Provide <u>Sound Evidence To Support Telegate's Proposals</u>

Telegate's filing spends the majority of its text arguing that the Commission should be persuaded to accept its proposal because of the "success" of its advocated model in Europe and elsewhere.[62] Others follow suit.[63] But as opponents correctly argue, Telegate's evidence is not

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[59] *See* Verizon at 21-22. *And see* SBC at 32-33 (complementary information technology, ordering and billing functionalities would take at least 24 months); 46-47 (any 555-xxxx deployment would take at a minimum 30 to 36 months to implement if AIN-based and until 2005-06 if switch-based).

[60] Telegate at 27.

[61] *Id.* at 12.

[62] *Id.* at 1, 3-18.

[63] InfoNXX at 20-21, 22; WorldCom at 5-6.

relevant to the United States environs (as demonstrated by the NERA Report and other comments).[64] The Commission should reject such advocacy as a basis to adopt the Telegate proposal domestically.

As AT&T correctly notes, unlike certain countries in Europe, which Telegate points to as positive examples of DA liberalization, the United States public network is not currently configured to permit the same types of calling sequences."[65] Due to material differences in network design and configuration between domestic networks and those in Europe, "the European carriers did not have to incur substantial and expensive network modifications."[66]

Rather than spending so much time discussing foreign directory assistance markets and deployments, Telegate would have been better off rebutting earlier-filed evidence on the differences between the domestic and foreign directory assistance markets. Its current arguments go no further than those it presented previously, and it make no serious attempt to explain why those European experiences are "similarly situated" either to the existing domestic directory assistance marketplace or to a predictable future one.

III. NOT ONLY DO TELEGATE AND ITS SUPPORTERS FAIL TO SUPPORT THEIR ARGUMENTS WITH FACTS, BUT SOME ARGUMENTS CLEARLY COMPROMISE THE PUBLIC INTEREST; OTHERS CANNOT BE RESOLVED APPROPRIATELY IN THIS PROCEEDING

Commentors supporting changes in the current 411 dialing framework argue not only for "new" dialing patterns or functionalities but sometimes combine their arguments with claims that the existing 411 dialing pattern should be eliminated. As discussed below, such action would not be in the public interest.

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[64] *See* AT&T at 3, 6-8 and n.12; BellSouth at 2, 20-23; NERA Report at 55-56; SBC at 52-55; Verizon at 17-18.

[65] AT&T at 3.

Other times commentors present as "simple" alternatives to the current 411 dialing pattern that are far from simple. In some cases, these commentors claim they are being frustrated or stymied in their ability to use technically-feasible dialing alternatives due to LECs' "bad acts." In some cases, these commentors fail to prove the technology or the policy that supports their positions. In other cases, the subject matter is too ill defined to rule that "implementation must occur." The Commission should proceed to study these areas carefully, as premature action could have serious and negative consequences for carriers called upon to deploy ill-defined proposals.

A. <u>411 Dialing For Directory Assistance Should Not Be Eliminated</u>

Telegate proposes that, if 411 presubscription is not adopted, 411XX be implemented and 411 eliminated.[67] Similarly, InfoNXX proposes that 555-xxxx dialing patterns become ubiquitous and over time 411 be eliminated.[68] Neither of these proposals is in the public interest and both should be rejected.

The Commission just recently found that the 411 dialing pattern was easy to use, provided customer convenience and that its continuation was in the public interest.[69] The easy-to-use" dialing attributes of 411 do not require extending the dialing pattern; nor is its elimination warranted if such extension fails to occur.[70]

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[66] *Id.* at 7.

[67] Telegate at 18-19. *And see* Metro One at 6 and Section 5 (arguing for 411+ACIC code deployment).

[68] InfoNXX at 18-24.

[69] *N11 First Report and Order*, 12 FCC Rcd. at 5600 ¶ 47. Even those urging modifications of the dialing pattern concede that it is "simple, [and] easy to remember." InfoNXX at 6, 10.

[70] AT&T at 9-12; CBT at 15-16; SBC at 51.

Local voice wireline directory services accessed through 411 are used by a limited number of customers, and even then used sparingly.[71] Often callers are persons with special needs or disabilities.[72] It would be impossible to prove the benefit of eliminating 411 dialing for these customers.

Nor has any party made a compelling case that 411 dialing should be eliminated as a directory assistance access code for wireless carriers. This is not surprising, perhaps, since the focus of this particular rulemaking proceeding is <u>not</u> on the use of 411 by wireless carriers, but wireline ones.[73] Still, it is the case that wireless callers who do make use of 411 dialing should not have to forego that option in the name of some kind of "regulatory parity," where all customers get find "parity" by sharing increased dialing burdens. Removing a customer

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[71] *See* note 28, *supra.*

[72] *See* CWA at 8 ("[b]ecause most users of directory assistance services are infrequent users, elimination of the 411 access code would cause confusion, particularly for children, elderly and disabled consumers"); Pennsylvania Office of Consumer Advocate at 2, 6-7 (stating call allowances for "charges for local DA service . . . from patients in hospitals or skilled nursing homes, or from residences where the caller is unable to use a directory because of a visual or physical handicap"). *And see id.* at 2 (noting that even where directory assistance services are deregulated -- such as in Iowa with respect to Qwest services -- there are often agreements to continue to provide call allowances to certain classes of customers). *See also* SBC at 25; Verizon at 28. *See further* NERA Report, Taylor, Ware Exhibit 1 listing the various DA State Exemptions.

[73] Like other commentors, Qwest opposes any change in the use of 411 in a wireless context, regardless of what regulatory intervention might occur with respect to wireline 411 dialing patterns. *See* Sprint at 8-9; Verizon at 5 and n.9. Thus, it opposes the arguments pressed by Metro One (apply all proposed "411 remedial" actions to wireline and wireless carriers, Metro One at 7-10), as well as those by CBT (that argue for "parity" of any regulatory burden, *i.e.*, if LECs must modify their 411 access arrangements for directory assistance, so must wireless carriers have to, CBT at 13-14). As InfoNXX notes at 4, "[w]ireless customers clearly appreciate [the] benefits" associated with their current directory services.

The *Notice* in this proceeding did not highlight wireless 411 usage as a topic of particular focus, although it did mention that there were suggestions that the presubscription proposals discussed in the *Notice* not be applicable to wireless providers. *Notice* ¶ 40 (referencing the comments of InfoNXX). Moreover, comments of proponents of 411 access code modifications to wireless convenience to accommodate undemonstrated claims of market dysfunction is not in the public interest.

B. Certain Issues Raised In This Proceeding Lack Critical Record Information To Allow For Resolution And A Further Rulemaking May Be Appropriate

Below Qwest addresses comments filed by parties arguing for alternatives to the Telegate presubscription proposals. These commentors address very complex technical matters in very limited pages of text. The issues discussed, *e.g.*, modification to existing Customized Routing services and the deployment of 555-xxxx dialing patterns to provide directory assistance services, lack the proffer by their proponents of fundamental technical feasibility assessments as well as cost recovery plans. This void renders these matters unsuitable for resolution in the current rulemaking. Should the Commission be interested in pursuing these matters further, it should seek further comment on the matters. Only in that way will a full record be developed to aid the Commission in resolving the matters consistent with sound economic principles and the public interest.

1. WorldCom's Arguments Regarding Customized Routing

WorldCom includes a section in its filing on customized routing, urging its need for such routing and LECs' obligations to provide it. In a footnote, WorldCom states that such routing "includes accommodating the DA providers needs for Feature Group D (FGD) signaling and all necessary switch translations," citing to the *UNE Remand Order*.[74] While that *Order* does

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carriers fail to provide any meaningful evidence on this subject to allow for any educated analysis or comment.

[74] WorldCom at 2 and n.2, 3 (referencing ¶ 462 of the *UNE Remand Order Order*, 15 FCC Rcd. 3696, 3902 (1999)).

reference customized routing and Feature Group D in the same paragraph,[75] it is not clear that the current WorldCom requests to Qwest are consonant with the discussion in that paragraph.

Customized Routing is a service provided by Qwest that allows it to route another carrier's end-user's operators services or directory assistance calls differently from Qwest's end-user's calls to operators or directory assistance when both end-users' calls originate on the same End Office switch. Customized Routing allows the carrier to identify and route particular classes of its end-user's calls to dedicated interoffice trunk facilities, including facilities provided by the carrier, facilities leased from Qwest as Unbundled Dedicated Interoffice Transport ("UDIT") or facilities provided by a third party. Such interoffice facilities may be terminated on the carrier's own directory assistance and/or operator services platform, on a third party's directory assistance service and/or operator services platform, or to Qwest's directory assistance service and/or operator services platform.

Qwest's tariffed Customized Routing service requires dedicated interoffice trunks and transport facilities. WorldCom is seeking a type of customized routing involving the routing of their operator services and directory assistance traffic to their existing Feature Group D trunks. Qwest has been working with WorldCom to develop a service that would match its requested requirements.

During the course of this work effort, however, WorldCom made an additional request for number reorigination. This would require a change in the existing signaling protocol of operator services/directory assistance calls from traditional signaling into equal access signaling. WorldCom's proposal also contains a presubscription element.

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[75] *UNE Remand Order*, 15 FCC Rcd. at 3903 ¶ 463.

WorldCom's proposal is more complex than its filing makes its sound. Moreover, its suggestion that there is controlling "law" favorable to their request is far from clear. Even if Qwest directs the operator services/directory assistance traffic to its existing Feature Group D trunks, the "service" described by WorldCom in its filing would not exist. Still, Qwest continues conversations with WorldCom on its request.

2. Criticisms of 555 Deployment

InfoNXX and Premiere share the common position that greater competition in the directory assistance marketplace is best achieved through the deployment of 555 numbers. Both present arguments to support their position; and both attack current LEC 555 deployments, hailing these "mis-deployments" as their primary evidence for Commission action in this area.[76]

The arguments of InfoNXX and Premiere ignore the complexity that can be associated with 555 deployments.[77] Thus, they engage to a great extent in "*ad hominem*" arguments (against Qwest and SWBT, respectively) that fail to fairly describe the "two sides" to the deployment matter.

The deployment of 555 necessarily requires LECs to develop an "offering" or a "service" that they do not currently provide. With such development there are costs,[78] which are partly dependent on demand. The matter of who should pay for the development work and the scope of the costs to be recovered is contentious, to be sure. But the fact of contention neither

[76] *See* Premiere, *passim* and InfoNXX at 8-10 (asserting at 8 that it has not been successful working with Qwest on 555-xxxx deployments from either a cost or implementation timeline perspective), 12-18. Metro One addresses this matter with a more subdued voice, asserting that in its experience, carriers will not activate the numbers. Metro One at 14, 21.

[77] *See* note 17, *supra* raising the issue of whether these services should be provided at all through non-900 numbers.

[78] It appears that for some carriers, 555-xxxx deployments are considered cost prohibitive. *See, e.g.*, AT&T at 14, n.31. Qwest cannot address why this is the case.

demonstrates a need for 411 presubscription (with its attendant huge costs for a wide variety of industry participants) or that the LEC is acting unreasonably.

Qwest and InfoNXX have exchanged some information, which is currently undergoing reassessment. The information previously provided to InfoNXX could shift to reflect either increased cost estimates or lowered ones; either longer implementation time frames or shorter ones. But the process continues and Qwest is willing (barring a contrary decision from the Commission) to work with InfoNXX to provide it 555-xxxx service with appropriate cost recovery.

IV. CONCLUSION

The common mantra of a variety of filing commentors is a variation of the phrase "if there is no problem, a fix is unnecessary."[79] Qwest agrees. As opponents of Telegate's (and others' alternative) proposals argue, the Commission should take no further regulatory action with respect to directory assistance services accessed through the 411 dialing pattern. As evidence presented by opponents of the proposals conclusively demonstrates, the 411 dialing pattern presents no barrier to entry and does not otherwise hinder competition. The evidence shows that, in fact, competition for directory assistance services is significant, as the Commission's past findings in this area confirm; and that it continues to grow. The broad variety of available directory assistance services demonstrates that no further Commission action is necessary to promote customer choice and the public interest. And, the fact that ILECs have witnessed sharp declines in directory assistance volumes argues against burdening these carriers

[79] AT&T at 8 ("[r]ather than devote significant resources in an attempt to solve a non-existent problem"), 9 (eliminating 411 dialing "would be an over-reaction to a non-existent problem"); BellSouth at 1 (the "entire discussion . . . is simply a solution looking for a problem"); CWA at 6 ("Telegate's 411 DA presubscription is a proposal in search of a problem"); ITTA at 11 ("Mandatory presubscription to 411 is a solution in search of a problem.").

with any additional costs with respect to the provision of the service, especially since cost recovery is far from a certainty.

For the reasons stated above, as well as those articulated in the filed comments on the *Notice*, the Commission should not promulgate rules adopting Telegate's 411 presubscription proposal or any of the proffered alternatives. Rather, it should find the *status quo* is in the public interest from the perspective of both competition and consumer accommodation.

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April 30, 2002

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **REPLY COMMENTS OF QWEST CORPORATION AND QWEST WIRELESS, LLC** to be filed with the FCC via its Electronic Comment Filing System, and a copy of the **REPLY COMMENTS** to be served, via email, on the parties listed below.*

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